

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

THE CROSSROADS GROUP, LLC, *et al.*,

1:23-cv-00184

Plaintiffs,

JUDGE J. PHILIP CALABRESE

vs.

CITY OF CLEVELAND HEIGHTS,  
OHIO, *et al.*,

Defendants.

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**DEFENDANTS CITY OF CLEVELAND HEIGHTS, OHIO’S, PAMELA  
ROESSNER’S AND GAJANE ZAHARJAN’S MOTION FOR EXTENSION OF TIME  
(UNTIL APRIL 17, 2023)  
TO RESPOND TO PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION**

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Defendants City of Cleveland Heights, Ohio, Pamela Roessner, and Gajane Zaharjan, by and through the undersigned counsel, hereby move for an extension of time until April 17, 2023 to respond to Plaintiffs’ Motion for Preliminary Injunction.

Pursuant to Fed.R.Civ.P. 4(d), the City of Cleveland Heights, Ohio, Pamela Roessner, and Gajane Zaharian (collectively referred to as the “City Defendants”) have waived Service of the Summons by request dated February 15, 2023 and therefore have been granted 60 days (until April 17, 2023) to respond to the Plaintiffs’ Complaint. Under the circumstances, therefore, the City Defendants respectfully request a similar extension of time until April 17, 2023 to respond to the Motion for Preliminary Injunction. In so doing, the City Defendants are requesting this additional

time to ensure that they have a sufficient opportunity to investigate the allegations of the Complaint and the applicable case law, and to prepare a proper, thorough, and consistent response to both the Plaintiffs' Complaint and the Plaintiffs' Motion for Preliminary Injunction at the same time.

WHEREFORE, the City Defendants respectfully requests that the Court grant an extension of time until April 17, 2023 to respond to Plaintiffs' Motion for Preliminary Injunction.

Respectfully submitted,

/s/ William R. Hanna

William R. Hanna (Reg. No. 0068705)  
Director of Law  
40 Severance Circle  
Cleveland Heights, Ohio 44118  
Direct Dial: (216) 377-1246  
Email: [whanna@ralaw.com](mailto:whanna@ralaw.com)

Stephen W. Funk (Reg. No. 0058506)  
Roetzel & Andress, LPA  
222 South Main Street, Suite 400  
Akron, OH 44308  
Direct Dial: (330) 849-6602  
Email: [sfunk@ralaw.com](mailto:sfunk@ralaw.com)

Lisa A. Mack (Reg. No. 0037180)  
Roetzel & Andress, LPA  
1375 East Ninth Street  
One Cleveland Center, 10th Floor  
Cleveland, Ohio 44114  
Direct Dial: (216) 293-7526  
Email: [lmack@ralaw.com](mailto:lmack@ralaw.com)

*Attorneys for Defendants City of Cleveland Heights,  
Ohio, Pamela Roessner, and Gajane Zaharjan*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 27th day of February, 2023, a copy of the foregoing *Motion for Extension of Time to Respond to Plaintiffs' Motion for Preliminary Injunction* has been filed electronically. Notice of this filing has been served upon counsel of record via the Court's electronic filing system. Access to this filing can be obtained via the Court's electronic filing system.

/s/ William R. Hanna  
William R. Hanna (Reg. No. 0068705)  
*One of the Attorneys for Defendants*